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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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AARON HERNANDEZ, *on behalf of himself and others*
similarly situated in the proposed FLSA Collective Action,

Case No. 1:22-cv-06918-DG-TAM

Plaintiff,

-against-

HAPPY STREET LLC, HAPPY STREET TOO LLC, and
SLOBODAN RADIVOJEVIC (a/k/a BOB
RADIVOJEVIC).

Defendants.
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**NOTICE OF MOTION TO BE RELIEVED OF AS COUNSEL
FOR DEFENDANT SLOBODAN “BOB” RADIVOJEVIC &
FOR A 90-DAY STAY FOR DEFENDANT TO RETAIN COUNSEL**

PLEASE TAKE NOTICE, that Defendant SLOBODAN RADIVOJEVIC (a/k/a BOB RADIVOJEVIC), through and by counsel, JOHNSON LITIGATION GROUP, P.C., and the undersigned, now move this Court to issue an order:

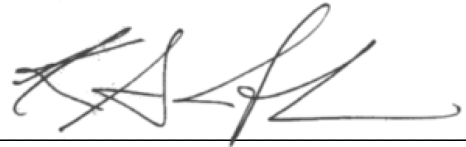
- 1) Pursuant to Local Civil Rule 1.4 of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, relieving Johnson Litigation Group, P.C., Kevin S. Johnson, Esq., and Deborah R. Kick, Esq., as attorneys of record for Defendant Slobodan Radivojevic, upon the request and consent of movant Defendant;

- 2) Pursuant to the Court's inherent powers (Landis v. N. Am. Co., 299 U.S. 248, 254-255 [1936]) and those under Fed. R. Civ. P. Rule 26(a), staying all discovery, notices, and litigation against movant Defendant for 90-days, so that Defendant may seek alternate legal counsel; and,
- 3) For such other and further relief as the Court may deem just and proper.

WHEREFORE, counsel for movant Defendant, Johnson Litigation Group, P.C., and Defendant himself respectfully request the Court grant the within motion and for such other and further relief as the Court may deem just and proper.

Dated: Great Neck, New York
December 6, 2023

JOHNSON LITIGATION GROUP, P.C.



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TO VIA EMAIL and/or ECF

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